

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

GEORGE COLLINS & ALRIKA  
COLLINS,

*Plaintiffs,*

v.

STATE FARM FIRE AND  
CASUALTY COMPANY,

*Defendant.*

CASE NO. 22-cv-318-RAW-JAR

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**PLAINTIFFS' EXPERT DISCLOSURES**

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Plaintiffs, George Collins and Alrika Collins, under Rule 26(a)(2) of the Federal Rules of Civil Procedure and this Court's Scheduling Order submit the following disclosures as to the individuals whom Plaintiff intends to call as non-retained expert witnesses at the trial of this matter.

These witnesses were retained by Plaintiff to help with claim evaluation and their interaction with Defendant related to Plaintiffs' claim. These are percipient fact witnesses who will testify about their observations and evaluations of the matters within their expertise from their inspection of the property after the loss (or the information and materials provided to them) and assisted Plaintiffs during the State Farm claim evaluation. Plaintiffs summarize their testimony through these summaries and attached reports:

- (1) Ian Rupert (public adjuster)  
Ian's Enterprise  
9450 SW Gemini Dr. #39525  
Beaverton, Oregon 97008-7105

Telephone: (405) 622-8721

Mr. Rupert was retained as Plaintiffs' public adjuster. He is expected to testify about his knowledge (based on inspection) of the damage to the Plaintiffs' property (home) and the reasonable and necessary costs of repair. On the Plaintiffs' behalf, he corresponded and communicated with State Farm during the claim evaluation process, prior to litigation, and is expected to testify about these matters. A more comprehensive summary of his damages estimate can be found in his report attached as Attachment 1 (Rupert Estimate).

Mr. Rupert may, in his testimony, explain some of his estimating evaluations based on materials he obtained and submitted with his report to State Farm (like the roof waste report from Restoration AI, the Property Detail report from Core Logic, and the EagleView report for accurate roof measurements, the Derek Vandorn Xactimate estimate, and other materials) attached as Attachment 2 (Rupert Materials). Rupert obtained input and estimates from some of the following witnesses and may testify to how those estimates or reports impacted his estimate.

- (2) Chad T. Williams, P.E.  
Valor Forensic Engineering Services, LLC  
P.O. Box 783  
Jenks, Oklahoma 74037  
Telephone: (855) 918-5111

Mr. Williams, an engineer, was retained to evaluate the fire damage to the property and will testify to his knowledge about his inspection and the report he drafted (the scope and needed repairs), which was submitted to Defendant during the claim evaluation process. A more comprehensive summary of his observations and related opinions can be found in his report, attached as Attachment 3 (Williams Report).

- (3) Kevin C. Dandridge  
1 Life Safety  
4605 E Chandler Blvd., Suite 110-163  
Phoenix, Arizona 85048  
Telephone: (602) 799-4800

Mr. Dandridge was retained to determine the proper impact and costs to safely return the property back to its pre-loss condition, considering any OSHA or other regulations, and will testify about the same. He reviewed an Xactimate ESX form, photos, the Valor Engineering report, Porter Volunteer fire department report, and State Farm's estimate to make safety recommendations for the work to be performed. He did not inspect the property and his report was drafted from the pictures and materials provided. A more comprehensive summary of his expected

testimony can be found in his report, which was submitted to State Farm during the claim evaluation period, attached as Attachment 4 (Dandridge Report).

- (4) Luke Hibbs  
The Mold Consultant  
726 Northwest 69th Street  
Oklahoma City, Oklahoma 73116  
Telephone: (405) 285-9100

Mr. Hibbs was retained to inspect the property for suspect areas and conditions for mold contamination and will testify to his observations and the opinions he formed from his inspection. He determined that some areas directly affected by the fire would need drywall removed and replaced. Same with the attic insulation. A more comprehensive summary can be found in his report, which was submitted to State Farm during the claim evaluation period, attached as Attachment 5 (Hibbs Report).

These witnesses may use their reports, the attachments thereto, the documents referenced as having been reviewed, or any photographs included within the reports or otherwise taken by them or others, in support of their opinions in their testimony at trial.

Respectfully submitted,

/s/Terry M. McKeever

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